

UNITED STATES DISTRICT COURT PUERTO RICO

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EMMETT W CALDWELL

Plaintiff

VS

COLL WATLINGTON LUIS; JUAN DOE 1 & 2 (JUAN DOE
1 & 2 IS A FICTITIOUS NAME REPRESENTING EVERYTHING
UNKNOWN PERSONS OR ENTITIES THAT
ABANDONED 1052 PONCE DE LEON* OP S

R COULD CLAIM INTEREST
TITLE, DEED, CLAIM, RIGHT
THE RIGHT OF RETENTION, ESTATE, TOTAL,
PARCEL

PLOT* 040-048-023-02-001 SANTRUCE

Defendants
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FOLLOWING FACTS SWORN TO UNDER OATH BY AFFIANT
PLAINTIFF KNOWN TRUTH PERSONALLY KNOWLEDGE

JURISDICTION DIVERSITY PIT ATLANTA DEF. PR OVER 75,000

FACTS TRUE NOT QUESTIONED

A) IRIS WADSWORTH MOTHER OF PLAINTIFF BOUGHT THE PROPERTY

PLOT 04004802302001 SAME 1052 PONCE DE LEON APPROX 1965

B) DEED AND SALES INVOICE TO BUYER IRIS WADSWORTH

WAS IN ENGLISH WITH TRANSLATION, AND ORIGINAL LOST AFTER

RECEIVED FOR REGISTRATION BY PUERTO RICO FREE ASSOCIATED STATE

COMPLAINT
DEMANDA

EXPEDIENTE DE DOMINO
PER TITLE 30 6291

20-20-1462(PAD)

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SAN JUAN, P.R.

A) IRIS WADSWORTH MOTHER OF PLAINTIFF BOUGHT THE PROPERTY
PLOT 04004802302001 SAME 1052 PONCE DE LEON APPROX 1965

B) DEED AND SALES INVOICE TO BUYER IRIS WADSWORTH 1965
WAS IN ENGLISH WITH TRANSLATION, AND ORIGINAL LOST AFTER SENT
RECEIVED FOR REGISTRATION BY PUERTO RICO FREE ASSOCIATED STATE NOT RECORDED

C) WADSWORTH IRIS PURCHASED P.04004802302001 DIED APPROX. 1967
FROM PRIOR OWNER WHOSE ESTATE WRONGFULLY SOLD AGAIN
VOID DEED ABANDONED PROPERTY

D) IRIS WADSWORTH MOTHER OF EMMETT CALDWELL SOLD THIS PARCEL
04004802302001 TO EMMETT CALDWELL 1986 WHO POSSESSED AS OWNER
PUBLICLY PEACEFULLY & PER REQUIREMENTS OF T.T.E. 30.
EXPONENTE DE DOMINIO RESTATE INCORP BY REFERENCE HERE

E) WITHOUT LEGAL RIGHT OR PROPER TITLE, STATUS ESTATE AFTER SALE TO
IRIS WADSWORTH SOLD TO OTHER PERSONS OR ENTITIES AFTER SELLER DIED
E) SELLER SELLER SOLD THIS PARCEL 04004802302001 ERRONEOUSLY WITHOUT LEGAL
TITLE (HAVE NO LEGAL RIGHT TO ANCESTORS IN TITLE WHO CONVEYED
TO LUIS WATLINGTON VOID TITLE WHO ABANDONED PROPERTY

F) PARAGRAPH E RESTATE INCORPORATED HERE BY REFERENCE, WITHOUT
RIGHT

LEGALLY AND ERRONEOUSLY OFFICE RECORDS HAVE COLL

WATLINGTON LUIS AS THE NAME OF THE PLOT OWNER 04004802302001

G) FOR MORE THAN 30 YEARS EMMETT CALDWELL PUBLIC, PACIFIC, CONTINUOUS AND
TITLE OF POSSESSED OWNER MAINTAINED, OCCUPIED, LEASED PLOT
04004802302001

FIRST CAUSE OF ACTION AGAINST COLL WATLINGTON LUIS

EXPIDENT OF DOMAIN TITLE XII Article 185 & 184 & AND P.R. LAWS

1) PARAGRAPH A RESTATE INCORPORATED HERE BY REFERENCE

10 PARAGRAPH B2 RESTATE INCORP HERE BY REFERENCE

2) PARAGRAPH B RESTATE INCORP HERE BY REFERENCE

3) PARAGRAPH C RESTATE INCORPORATED HERE BY REFERENCE

4) PARAGRAPH D RESTATE INCORPORATED HERE BY REFERENCE

5) PARAGRAPH E ~~RE STATED INCORPORATED~~ HERE BY REFERENCE

6) PARAGRAPH F ~~RE STATED INCORPORATED~~ HERE BY REFERENCE

7) PARAGRAPH G ~~RE STATED INCORPORATED~~ HERE BY REFERENCE

8) NO DEFENDANT HAS LEGAL TITLE, LEGAL DEED
CLAIM, RIGHT OF RETENTION, REAL ESTATE, OR TRIAL,
ABOUT 1052 PONCE DE LEON SANTRUCE PARCLA 04004802302001
ADVERSE TO EMMETT CALDWELL SOL LEGALLY OWNED

9) ALL PREVIOUS LEGAL OWNERS OF 1052 PONCE DE LEON PARCLA
04004802302001 PREVIOUSLY SOLD TO ANCESTORS IN TITLE
FROM EMMETT CALDWELL OR I DO NOT RECEIVE LEGAL TITLE AND ALL DEFENDANTS
ABANDONED PLOT 04004802302001

10) APPLICANT LIVES IN 1052 PONCE DE LEON PARCELLA 04004802302001

11) PLAINTIFF MEETS REQUIREMENTS OF TITLE XII ARTICLE 184 & 185
& 187 & LEYS OF PUERTO RICO FOR DOMAIN AND SALE OF
OTHER RELIEF BY REGISTERED ORDER EMMETT CALDWELL SCRIPT
OWNER ONLY AND TERMINATION OF PROPERTY RIGHTS OF ALL
DEMANDERS

12) 185a(a)DEMANDER EMMETT CALDWELL PROMOTES LIVING IN PART
OF PLOT 04004802302001 SINCE 1986 WHEN THIS
PROPERTY

13) 185(1b)THE SUBJECT PROPERTY OF THIS CLAIM IS IN SANCTION
1052 PONCE DE LEON YOU HAVE BUILDING OF 20297 SQ FT APPROXIMATELY

14) 185 c CAT. NUMBER OF PROPERTY EN 04004802302001 MUNICIPAL REVENUE
CENTER REGISTERED

JOHN DOE NOR ANY DEFENDANT KNOWN OR UNKNOWN DOES NOT HAVE ANY INTEREST CLAIM TITLE RIGHT
ESTATE LIEN ON 1052 PONCE DE LEON

ATTACHED SWORN STATEMENT PER TITLE 30 6219 & EXPEDIENTE DE DOMINO RESTATED INCORPORATED
REFERENCE

16) 185e THIS PROPERTY IS FREE OF CHARGES

17) 185f EMMETT CALDWELL IS DUENO NOW PURCHASE OF PREVIOUS
OWNER LAND & HABITAT CONSERVATION INC WHO SOLD 2019;
PREVIOUSLY IN 2018 EMMETT CALDWELL SOLD TO LAND &
HABITAT CONSERVATION INC BUT THEY RETURNED BECAUSE THEY
CAN PAY PRICE TO EMMETT CALDWELL SELLER

18) 185g EMMETT CALDWELL CLAIMANT ACQUIRED THE PROPERTY FROM
PREVIOUS OWNER BY GENERAL WARRANTY DEED (Exhibito)

19) FOR MORE THAN 30 YEARS APPROX 1967 PLAINTIFF'S ANCESTORS IN TITLE
IN TITLE HAVE POSSESSED AND RENTED THE PROPERTY
PUBLICLY, PEACEFULLY AND CONTINUOUSLY PER EXPEDIENTE DE DOMINO

20) LOT 04004802302001 HAS A BUILDING 1502 PONCE DE LEON
WAS A PREVIOUS PLAINTIFF'S PLOT OF LAND IN
IRIS WADSWORTH BOUGHT APPROX 1967

21) 185J PARCELLA 04004802302001 HAS VALUE OF APPROXIMATELY 383290

22) 185k CLAIMANT WILL PRESENT INVOICE OF SALE, DEEDS (AMERICAN)
SALES WRITING AFFIDAVITS, TESTIMONIALS, MAPS
LETTERS, RECEIPTS, AND OTHER EVIDENCE

WHEREFORE

PLAINTIFF REQUESTS ORDER OF EXPEDIENTE DE DOMINO AND APPROPRIATE RELIEF TITLE REGISTERED TO
CALDWELL AND PRIOR NAMES DELETED FROM REGISTRY

HECHOS JURADOS VERDADEROS BAJO JURAMENTO Y LEYES A CONOCIMIENTO
PERSONAL POR TITULO.30-6291

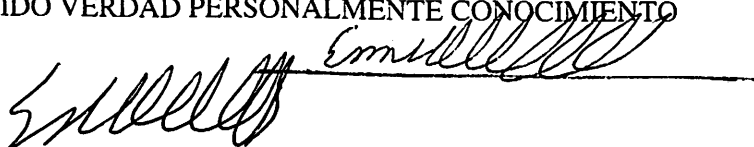
- 23 A) EMMETT CALDWELL ADQUIRIÓ PARCELO4004802302001 1986 DE LA MADRE DE IRIS WADSWORTH CON QUIEN RESIDIÓ EN NC AHORA RESIDENTE DE ATLANTA GA
- 23 B) LA PROPIEDAD ES COMO SE DESCRIBE EN LA DISCRIPCIÓN LEGAL EXPONER UN ADJUNTO RESTABLECIDO INCORPORADO AQUÍ POR REFERENCIA
- 23 C) CADASTRE #04004802302001
- 23 D) Puede o no ser registrado debido a COVID indeterminado
- 23 E) Libre de cargos según el mejor conocimiento
- 23 F) Propietario anterior inmediato Land and Habitat Conservation Inc (Tierra registrada con nombres de error por error Coll Watlington Luis cuyas circunstancias personales se desconocen
- 23 G) Adquirido mediante escritura pública
- 23 H) El demandante poseyó desde que fue escriturado el lote 1986 (por Iris Wadsworth su madre, quien también poseyó desde 1967) ambos continuaron la posesión pública pacífica continua bajo el título de propietarios juntos durante 53 años por el Título 30-6291 y
- 23 El petionario fue transferido en parte a Land and Habitat Conservation Inc. cuyo título fue transferido al petionario 2018 (anexo c)
- 23 I) La propiedad se mantiene del mismo tamaño desde que fue poseída por el Petionario y Wadsworth.
- 23 J) Valor actual \$250,000.aprox
- 23 K) Escrituras facturas de venta estados de cuenta recibos ect
- 23 L) Otras acusaciones son que el propietario que vendió a Iris Wadsworth se le confió la escritura de propiedad verificada se registró a nombre de Wadsworth y administró y alquiló la propiedad hasta su muerte, su patrimonio sin saber de la venta a Wadsworth o transfirió erróneamente la propiedad de título nulo sin valor terminó a nombre de Coll Watlington Luis que abandonó la propiedad. El demandante descubrió recientemente que la razón por la cual la escritura original de Iris Wadsworth no se pudo registrar en los años 60 es que la escritura americana de Wadsworth no era una escritura de puerto español con requisitos exclusivos.
- La persona que mantenía la propiedad del demandante murió sin que Caldwell lo supiera.
- 23 M La notificación de esta acción será enviada al Alcalde de Santurce, al Secretario de Transporte y Obras Públicas, al Fiscal de Distrito, a los propietarios de las parcelas adyacentes.
- 23 N La propiedad no está registrada a nombre de una persona que no sea Coll Watlington no está a nombre del Demandante la razón de esta acción es para que la Orden tenga la propiedad registrada a nombre de Caldwell

Hechos mencionados Juramentados verdades conocidas personalmente bajo leyes y juramento el 9/2/2020

SIGUENDO HECHOS JURADO BAJO JURIMENTO CIERTO POR AFFIANTE

DEMANDANTE CONOCIDO VERDAD PERSONALMENTE CONOCIMIENTO

9/2/20



SWORN FACTS TRUE UNDER OATH AND LAWS TO PERSONAL KNOWLEDGE PER Title.30-6291

- a) EMMETT CALDWELL ACQUIRED PARCEL 04004802302001 1986 FROM IRIS WADSWORTH MOTHER WITH WHOM HE RESIDED IN NC NOW ATLANTA GA RESIDENT
- b) THE PROPERTY IS AS DESCRIBED IN LEGAL DISCRIPTION EXHIBIT A ATTACHED RESTATED INCORPERATED HEREIN BY REFERENCE
- c) CADASTRE #04004802302001
- d) it may or may not be registered due to COVD undeterminable
- e) free of charges to best knowledge
- f) Immediate previous owner Land and Habitat Conservation Inc (Land registered in error names mistakenly Coll Watlington Luis whose personal circumstances unknown
- g) Acquired by deed
- h) Petitioner possessed since was deeded lot 1986 (by Iris Wadsworth his mother who also possessed since 1967) both continued public peaceful continuous possession under the title of owners together over 53 years per Title 30-6291 & Petitioner transfered partly to Land and Habitat Conservation Inc which Title was transfered to Petitioner 2018 (exhibit c)
- i) Property maintained same size since possessed by Petitioner and Wadsworth
- j) current value \$250,000. approx
- k) deeds bills of sale statements receipts ect
- l) other allegations are the owner who sold to Iris Wadsworth was entrusted with verified property deed was recorded in Wadsworth name and managed and rented property till died, her estate unaware of sale to Wadsworth or wrongly transfered void worthless title property ended up in name of Coll Watlington Luis who abandoned property. Plaintiff only recently discovered reason original deed to Iris Wadsworth could not be recorded in 1960s is due to the American deed to Wadsworth was not a Spanish Puerto Deed haveing exclusive requistes Person who was maintaining property for plaintiff died unknown to Caldwell

2 Notication of this action will be mailed to Mayor of Santurce Secretary of Transportation and Public Works, District Attorney, adjacent parcel owners

5 The property is not registered in the name of a person other than Coll Watlington is not in name of Petitioner the reason for this action is for Order to have the property registered in name of Caldwell

Facts aforesated Sworn true known personally under laws and oath on 9/2/2020

EMMETT W CALDWELL

12/20/2020 *Expediente del Dominio & appropriate Reliefs under law*
W herefore Plaintiff requests Order on
EMMETT CALDWELL
EMMETT CALDWELL